

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**DANA JENNINGS**

:

:

**And**

:

:

**JOSEPH A. FURLONG**

:

:

**Plaintiffs**

**: CIVIL ACTION NO. 5:21-cv-05400**

:

**v.**

:

:

**CARVANA LLC**

:

:

**Defendant**

:

**Harvin, et al.**

:

:

**Plaintiffs**

:

:

**v.**

**: CIVIL ACTION NO. 2:23-cv-02068**

:

**CARVANA LLC, et al.**

:

:

**Defendants.**

:

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**CERTIFICATE OF GOOD-FAITH MEET AND CONFER**

The undersigned counsel certifies that counsel for Carvana, LLC made a good-faith effort to meet and confer with Plaintiffs' counsel to determine whether the pleading deficiencies identified in Carvana, LLC's Motion to Dismiss could be cured by amendment. The parties had a productive discussion that led to Plaintiffs' agreement to voluntarily dismiss Count Two on behalf of Plaintiff Jennings and a putative Transit Charge Class and Subclass, as predicated on alleged acts set forth in Paragraphs 25 through 34 and Paragraph 118(c)–(i) of the Amended Consolidated Class Action Complaint, solely as to Defendant Bridgecrest Credit Company LLC, without

prejudice. The parties were not able to reach an agreement to cure any of the remaining identified deficiencies by amendment.

Respectfully submitted,

Dated: April 2, 2025

/s/ Thomas F. Burke  
Daniel JT McKenna (PA ID 93930)  
Thomas F. Burke (PA 320311)  
Katherine L. Oaks (PA ID 321500)  
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